

Memo

To: SPOE Staff, On-going Service Coordinators, Service Providers
From: Margaret Strecker, Assistant Director - Compliance
Date: 1/27/2006
Re: IFSP Meetings

The following information is being provided because of concerns raised during monitoring about service coordinators' lack of understanding regarding federal and state Part C requirements related to conducting IFSP meetings. This document includes information on when and how meetings must be conducted, who must be invited, and requirements for provision of written notification of the meetings. The basis for the following information can be found in IDEA Part C Regulations sections 303.342 and 303.343 and Missouri Part C Regulations Section VI. It is important that all intake and service coordinators review these regulations as well as the following instructions.

The Initial IFSP Meeting:

When must the meeting be conducted?

The initial IFSP meeting is held after the child's eligibility has been determined and all necessary assessments have been conducted to assist the IFSP team in determining appropriate initial services. It must be held within 45 days of the referral date unless there are documented parent or child related reasons for delaying the meeting.

How must the meeting be conducted?

The meeting must be conducted as a face to face meeting; however, if any required member cannot be present, it is acceptable for them to be connected to the meeting via conference call.

Who are the required participants?

The meeting must include at a minimum:

- The parent or parents of the child
- Other family members, as requested by the parent, if feasible to do so
- An advocate or person outside of the family, if the parent requests that the person participate.
- The Intake Coordinator for the child and family
- The individuals who conducted evaluations or assessments used to determine eligibility or plan for the IFSP
- *Service providers as appropriate (see note below)
- The ongoing Service Coordinator should be invited, but is not a required participant

If the person(s) who conducted evaluations or assessments cannot attend, they must be given the option of participating through conference call, having a knowledgeable, authorized representative

attend, or by making pertinent records available at the meeting. Participating by report means that the provider has provided a written report to the Intake Coordinator or they have provided information to the Intake Coordinator by phone, and either type of information is available to the IFSP team at the time of the meeting. If the child was found eligible based on a medical condition, the physician who made the diagnosis is considered part of the multidisciplinary team that contributed to the eligibility determination and the fact that their report is available at the time of the IFSP meeting must be indicated on the IFSP. (That professional should be shown as participating by report.)

*Potential service providers (other than individuals who have conducted the evaluations or assessments) are not invited to the initial IFSP except in the rare case that a child is already receiving some services under another funding source prior to the initial IFSP. The reason for this is that services are not to be pre-determined. The IFSP team determines what initial services the child will need based upon the outcomes developed in the IFSP

Interim IFSP Meeting:

When must the meeting be conducted?

There are two circumstances in which it is appropriate to conduct an Interim IFSP meeting prior to holding an Initial IFSP meeting.

1. The Intake Coordinator has sufficient information to determine the child is eligible, but all the necessary assessments have not been conducted to plan for the initial IFSP meeting and the child has obvious immediate needs that are identified (possibly even at the time of referral). For example, a physician may recommend that a child with cerebral palsy begin receiving physical therapy as soon as possible. In this example, the remaining assessments must still be completed within 45 days of the referral date.
2. The Intake Coordinator has sufficient information to determine the child is eligible, but because of exceptional circumstances (e.g. the child is ill), it is impossible to complete the assessments within 45 days. An interim IFSP may be completed if the inability to complete the evaluation/assessment within 45 days is related to family and/or child reasons, not based on administrative delays.

How must meetings be conducted?

See Initial IFSP section above.

Who are the required participants?

See Initial IFSP section above.

Periodic Reviews:

What is a Periodic Review?

State and Federal regulations refer to periodic reviews as the required reviews that must be conducted every six months as well as those meetings that are scheduled more frequently if conditions warrant, or if the family requests such a review. In Missouri's training and procedural documents and web based data system, we have referred to these meetings that are scheduled more frequently if conditions warrant as interperiodic reviews to distinguish these from the required 6 month reviews.

Periodic reviews are conducted to determine the degree to which progress toward achieving outcomes is being made and whether modification or revision of the outcomes or services is necessary.

When must the periodic meeting be conducted?

A six month review of the IFSP must occur no more than 6 months after the initial or annual IFSP meeting date unless there are documented parent or child reasons for exceeding these timelines. It is important to plan ahead and schedule the meeting in ample time to ensure compliance with this requirement. It is acceptable to hold a six month review up to about a month prior to the 6 month due date.

Interperiodic reviews are scheduled as conditions warrant. This may occur when the service coordinator receives a request from the family or a provider or the service coordinator is aware of problems concerns that need to be discussed between the times when required meetings or reviews are due.

How must the periodic reviews be conducted?

Federal and state regulations state that periodic reviews may be carried out by a meeting or by another means that is acceptable to the parents and other participants.

6 month reviews: For 6 month reviews, the service coordinator may schedule a meeting, or may call the parent and each member of the IFSP team to determine the progress on outcomes and find out if anyone believes there are any changes needed in the IFSP (outcomes or services). If no one feels changes are needed, the service coordinator may document these contacts in IFSP case notes and complete the necessary IFSP review documentation for the 6 month review.

If any IFSP team member wants to discuss a possible change in outcomes or services, it is our expectation that a meeting must be conducted because of the potential for a change in outcomes and/or services on the IFSP. When a 6 month review is being conducted by meeting, the service coordinator must send out the meeting notification form to all appropriate participants early enough before the meeting date to ensure that they will be able to attend. (See section on meeting notification requirements at the end of the document.) The meeting may be held as a face to face meeting or through a conference call. If the invited provider(s) are unable to attend in person or through a conference call but will be participating by report, the meeting may be held by a telephone call between the service coordinator and the parent, if holding a meeting by telephone is acceptable to the parent.

If the service provider cannot attend or participate by conference call, the service coordinator must not delay the meeting beyond the required timelines in order to find a workable date. In this case, the service coordinator should attempt to obtain a written report or take a report by phone so the provider can at least participate by report if possible

Whether the IFSP is in the web system or is in the form of a hard copy because the child's record has not yet been converted to the new system, the IFSP in the child's official early intervention record must include all required IFSP components.

Interperiodic reviews: Because the interperiodic review is only held when someone on the team has requested a team meeting to discuss issues that may result in a change in the outcomes or services on the IFSP, it is our expectation that a meeting must be held. All provisions listed above for conducting the 6 month review meetings when it has been determined a meeting is necessary apply.

Who are the required participants?

- The parent or parents of the child
- Other family members, as requested by the parent, if feasible to do so
- An advocate or person outside of the family, if the parent requests that the person participate
- The child and family's ongoing service coordinator
- If conditions warrant, provisions must be made for the participation of the child's service providers and individuals who have conducted assessments for the purpose of IFSP planning.

The service coordinator may invite all providers for the child, but at a minimum, must invite any providers who are providing services that will be discussed because of the potential need for changes in those services or related outcomes and strategies.

Annual IFSP Meeting:

When must the meeting be conducted?

The annual IFSP meeting is held no more than 365 days after the initial or previous annual IFSP meeting that was held for the child unless there are documented parent or child reasons for exceeding these timelines.

How must the meeting be conducted?

The meeting must be conducted as a face to face meeting; however, if any required member cannot be present, it is acceptable for them to be connected to the meeting via conference call.

Who are the required participants?

The meeting must include at a minimum:

- The parent or parents of the child
- Other family members, as requested by the parent, if feasible to do so
- An advocate or person outside of the family, if the parent requests that the person participate.
- The child and family's ongoing service coordinator
- The individuals who conducted evaluations or assessments used to plan for the IFSP
- Service providers as appropriate

It is expected that the service coordinator will invite all of the child's current First Steps service providers to the annual IFSP meeting in order to facilitate a complete and meaningful annual meeting to evaluate the IFSP.

If the service provider cannot attend or participate by conference call, the service coordinator must not delay the meeting beyond the required timelines in order to find a workable date. In this case, the service coordinator should attempt to obtain a written report or take a report by phone so the provider can at least participate by report.

If the person(s) who conducted ongoing assessments for the purpose of IFSP planning cannot attend, they must be given the option of participating through conference call, having a knowledgeable, authorized representative attend, or by making pertinent records available at the meeting.

Requirements for providing written meeting notification:

Federal and state regulations implementing Part C of the Individuals with Disabilities Education Act (IDEA) require that meeting arrangements must be made and **written notification** provided to the family and other participants early enough before the meeting date to ensure that they will be able to attend. Prior to holding an IFSP meeting, service coordinators must send written notification (mail or e-mail) containing the required components which are included in the First Steps Meeting Notification form to the family and other participants. This notification must be sent at least 10 days prior to the meeting unless there is a necessity to hold the meeting sooner and the parent agrees to the earlier date. While the regulations require meeting notification be sent to all proposed participants, the regulations do not require that the meeting be held only when all participants are able to attend.

The regulations specify certain members who must be in attendance or whose participation be accommodated through other means. Service Coordinators should make an attempt to include all proposed participants, but must ensure that the meeting includes all those that are required.

In the new data system, providers are able to view information regarding upcoming meetings for children on their caseload by accessing the Missouri First Steps web site; however, this does not constitute a written notification that meets the regulatory requirements of Part C. In order to meet the written meeting notification requirements of Part C, a hard copy of the meeting notification, including the names of all individuals who received the notification, must be sent to all participants and a duplicate placed in the child's early intervention record.